

**REMARKS**

Claims 1-12 and 40-48 are pending. By this Amendment, claims 1, 4, 7, 9, 44 and 46 are amended, claims 47 and 48 are added and the specification is amended. The claims are amended to even more clearly distinguish over the applied references. The features added to claims 1 and 4 are supported in the original specification at, for example, page 35, line 4 - page 45, line 18. The features added to claims 7 and 9 are supported throughout the specification, and the features of new claims 47 and 48 are supported throughout the specification and in the original claims. The formula (6) in the specification is amended to: (i) delete an extra opening parenthesis "(" before the second "R" in lines 1, 2, 4-6 and 8 of the formula, and (ii) to insert a missing "}" before the "X" in lines 6 and 8 and after "kc9" in line 9 of the formula. Thus, no new matter is added by the above amendments.

Claims 1, 2, 4, 5, 40, 42, 45 and 46 stand rejected under 35 U.S.C. §103(a) over U.S. Patent No. 5,153,730 to Nagasaki et al. in view of U.S. Patent No. 5,373,322 to Laroche et al., and further in view of U.S. Patent No. 6,661,451 to Kijima et al. This rejection is respectfully traversed.

The Office Action relies upon Laroche et al. to modify Nagasaki et al. to allegedly result in the second image processing circuit of independent claim 1 and the second image processing instruction of independent claim 4. However, neither Nagasaki et al. nor Laroche et al. discloses or suggests an image processing circuit or instruction, as recited in independent claims 1 and 4, respectively, that performs format processing in units of blocks ranging over  $n$  lines  $\times$   $m$  rows to produce second image data having a block size of  $(n - i) \times (m - j)$ , wherein  $i$  and  $j$  are integers having values of at least 1 (that is, the second image data has a block size smaller than the blocks of first image data on which the format processing is performed), the smaller block size of the second image data being necessary for the recording processing subsequently performed on the second image data. Kijima et al. also does not disclose or

suggest such a feature. Thus, independent claims 1 and 4, along with their dependent claims, are patentable. Withdrawal of the rejection is requested.

Claims 3 and 6 stand rejected under 35 U.S.C. §103(a) over the above references that are applied against claims 1 and 4, and further in view of U.S. Patent No. 5,631,701 to Miyake. In addition, claim 41 stands rejected under 35 U.S.C. §103(a) over the references applied against claim 1, and further in view of U.S. Patent No. 6,532,039 to Anderson. These rejections are respectfully traversed. Claims 3, 6 and 41 are patentable for at least the reasons set forth above with respect to their corresponding independent claims 1 and 4. Withdrawal of the rejections is requested.

Claims 7-10 stand rejected under 35 U.S.C. §103(a) over U.S. Patent No. 5,414,464 to Sasaki in view of U.S. Patent No. 5,778,106 to Juenger et al.<sup>1</sup> This rejection is respectfully traversed.

Applicants respectfully disagree with the Office Action's assertion that Juenger et al. discloses the simultaneous interpolation/low pass filtering of independent claims 7 and 9. Juenger et al. discloses an electronic camera in which interpolation processing, processing for creating color-difference signals and median filtering processing are implemented in that order. See, for example, col. 5, line 43 - col. 8, line 13 of Juenger et al.

Based on the Office Action's comments on page 2, item 1 of the November 17 Office Action, it appears that the Office Action asserts that the median processing of Juenger et al. corresponds to the simultaneous interpolation and filtering processing of claims 7 and 9, in spite of the fact that Juenger et al. explicitly distinguishes between interpolation processing and median processing. One of ordinary skill in the art would not consider the Juenger et al. median processing to correspond to interpolation and/or low pass filtering of claims 7 and 9. The

---

<sup>1</sup> The Office Action continues to erroneously identify the patent number for Sasaki as U.S. Patent No. 6,289,127, which is a patent that is not of record and that is not to Sasaki.

median processing of Juenger et al. also does not provide "further color difference signals" that are "assigned to pixels originally having no color difference signal" as now recited in claims 7 and 9. Rather, the Juenger et al. median processing assigns a new value to a pixel that already has a value. Moreover, the Juenger et al. "filter coefficients" that "have a coefficient of 1" concocted in the Office Action are not disclosed in Juenger et al. and would not result in any filtering. That is, applying a "coefficient of 1" to all data is not filtering at all. Applicants respectfully submit that the Office Action's reading of claims 7 and 9 on Juenger et al. is unreasonable and relies on impermissible hindsight. One having ordinary skill in the art would not have been motivated to obtain the combination of features recited in independent claims 7 and 9 from reading Sasaki and Juenger et al. Withdrawal of the rejection is requested.

Dependent claims 47 and 48 depend from claims 7 and 9, respectively, and are patentable for the additional reason that Sasaki and Juenger et al. do not disclose the combination of features recited in these claims, including the simultaneous interpolation/low pass filtering processing of claims 7/9, and the median processing recited in claims 47 and 48.

Claims 11, 12, 43 and 44 stand rejected under 35 U.S.C. §103(a) over Nagasaki et al. in view of Juenger et al., and further in view of Kijima et al. This rejection is respectfully traversed.

The rejection of claims 43 and 44 is improper because these claims depend from claim 1, which is rejected in view of a different combination of references. Moreover, these claims are patentable for at least the reasons set forth above with respect to independent claim 1.

With respect to claims 11 and 12, the combination of Nagasaki et al., Juenger et al. and Kijima et al. does not disclose or suggest the combination of features recited in independent claim 11. Claim 11 recites, among other things, that median processing is carried out as part of the format processing that is performed by the second image processing circuit, the format processing being appropriate for data compression. Juenger et al. discloses an interpolation of

RGB, a conversion of interpolated RGB signals into color difference signals, a median filtering processing, and a conversion of the image signals that have undergone the median filtering processing into RGB signals. Thus, Juenger et al. does not disclose a median processing that is performed during format processing for a compression of images. Because Juenger et al. creates RGB signals as its final signal, no format processing appropriate for compression of an image is disclosed.

Furthermore, the median processing of Juenger et al. is carried out in units of  $(1 \times m)$ , whereas claim 11 recites that the median processing is performed on blocks of  $(n \times m)$ , where  $n$  and  $m$  each are equal to or greater than 2.

Accordingly, claims 11 and 12 are patentable over the combination of Nagasaki et al., Juenger et al. and Kijima et al. Withdrawal of the rejection is requested.

In view of the foregoing, Applicants respectfully submit that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,



Mario A. Costantino  
Registration No. 33,565

MAC/jth

Attachment:

Request for Continued Examination (RCE)

Date: February 15, 2006

**OLIFF & BERRIDGE, PLC**  
**P.O. Box 19928**  
**Alexandria, Virginia 22320**  
**Telephone: (703) 836-6400**

**DEPOSIT ACCOUNT USE  
AUTHORIZATION**

Please grant any extension  
necessary for entry;

Charge any fee due to our  
Deposit Account No. 15-0461